## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

§	
§	
§	
§	
§	Civil Action No. 3:21-cv-818-S
§	
§	
§	
§	
§	
§	
	<i>\$\tau\$</i> \$\tau\$ \$\tai\$

# DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

## TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants KeyCity Capital, LLC, ("KeyCity Capital" or "Defendant") and Tie Lasater ("Lasater" or "Defendant") and respectfully move this Court to allow Charles M.R. Vethan and Jens K. Sandberg of The Vethan Law Firm, PC, Two Memorial City Plaza, 820 Gessner Rd., Suite 1510, Houston, Texas 77024, to withdraw as counsel of record for Defendants in the above-captioned case, and they be removed from the electronic service list in this case, and that **Stuart L. Cochran** and **Blake E. Mattingly** of **STECKLER WAYNE COCHRAN CHERRY PLLC**, 12720 Hillcrest Rd., Suite 1045, Dallas, Texas 75230, be substituted as lead counsel for Defendants KeyCity Capital and Tie Lasater.

This withdrawal and substitution of counsel has been agreed to by Defendants and Plaintiff and is not sought for the purposes of delay, but so that justice may be done. By the execution of this Motion, all parties indicate their agreement to this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendants KeyCity Capital, LLC and Tie Lasater respectfully request that the Court grant this Unopposed Motion to Withdraw and that Charles M.R. Vethan and Jens K. Sandberg be withdrawn as attorneys of record and Stuart L. Cochran and Blake E. Mattingly be substituted in as attorneys for Defendants.

Dated: November 1, 2021. Respectfully submitted,

#### STECKLER WAYNE COCHRAN CHERRY PLLC

/s/ Stuart L. Cochran

Stuart L. Cochran

Texas Bar No. 24027936

Blake E. Mattingly

Texas Bar No. 24104229

12720 Hillcrest Rd, Suite 1045

Dallas, Texas 75230

T - 972.387.4040

F - 972.387.4041

Email: stuart@swclaw.com Email: blake@swclaw.com

ATTORNEYS FOR DEFENDANTS KEYCITY CAPITAL, LLC & TIE LASATER

#### **AGREED TO:**

/s/ Charles M.R. Vethan

Charles M.R. Vethan State Bar No. 00791852 THE VETHAN LAW FIRM, PC Two Memorial City Plaza 820 Gessner Rd., Suite 1510 Houston, TX 77024

T: 713.526.222 F: 713.526.2230

edocs@vwtexlaw.com

/s/ Jens K. Sandberg

Jens K. Sandberg State Bar No. 00791852 THE VETHAN LAW FIRM, PC Two Memorial City Plaza 820 Gessner Rd., Suite 1510 Houston, TX 77024

T: 713.526.222 F: 713.526.2230 edocs@vwtexlaw.com

## **CERTIFICATE OF CONFERENCE**

I, Stuart L. Cochran, hereby certify to the Court that Defendant's counsel conferred with all counsel of record herein in an effort regarding this Motion and opposing counsel has indicated that they do not oppose this motion.

/s/ Stuart L. Cochran
Stuart L. Cochran

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on November 1, 2021, a true and correct copy of the foregoing Unopposed Motion to Withdraw and Substitute Counsel was served upon all counsel of record via the Court's ECF system.

/s/ Stuart L. Cochran
Stuart L. Cochran